Civil Records

LOUIS J. PERRET CLERK OF COURT, PARISH OF LAFAYETTE P. O. BOX 2009 LAFAYETTE, LA 70502 Telephone: (337) 291-6303 Fax: (337) 291-6392

STATE OF LOUISIANA PARISH OF LAFAYETTE OFFICE OF THE CLERK OF COURT 15TH JUDICIAL DISTRICT COURT

I, Deborah A. Duplechin, Deputy Clerk of Court, in and for the Parish of Lafayette, State of Louisiana, do hereby certify that the attached documents are true and correct copies from the civil suit entitled:

**JAMES LANDRY** 

VS

DOCKET NUMBER: C-20236856 J

LHC GROUP INC

Consisting of 14 pages, the original of which documents are on file in the Lafayette Parish Clerk of Court Office.

Lafayette, Louisiana, this JANUARY 9, 2024.

Deborah A. Duplechin, Deputy Clerk of Court Lafayette Parish

## Document 2 10

## Filed 01/19/24

Page 2 of 17 PageID #:

Dec 6 2023 01:37pm No. 1464 P. 1 P001

Dec. 6. 2023 1:25PM

Received:2253432870 Miller Hampton Hilgendorf Atty

Lafayette Parish Filed Dec 06, 2023 2:11 PM Martina Reaux **Deputy Clerk of Court** 

C-20236856

## Miller, Hampton & Hilgendorf

Attorneys at Law 3960 Government St. Baton Rouge, LA 70806 PHONE: (225) 343-2205 FAX PHONE: (225) 343-2870

TO: 5th JDC Clerk	FROM: GREGORY MILLER
ATTN:	PAGES: (
FAX: 337-291-0480	DATE: 12 00 23
RE: James Landry	CC:
☐ Urgent For your review	□ Please comment □ Reply ASAP
Notes:	
	*
privileged and confidential information intended of message is not the intended recipient, you are here	and the documents accompanying it may contain work product and/or nly for the use of the individual or entity named above. If the reader of this eby notified that any dissemination, distribution or copy of this telecopy is by in error, please immediately notify us by telephone and return the original ostal Service. Thank you.

Dec. 6. 2023 1:25PM

Filed 01/19/24

Page 3 of 17 PageID #:

11

Received:2253432870
Miller Hampton Hilgendorf Atty

Dec 6 2023 01:37pm No. 1464 P. 2 P002

## Miller, Hampton & Hilgendorf

Attorneys at Law

Gregory J. Miller, Attorney Bernard Hampton, Attorney Amanda Hilgendorf, Attorney Jordan Davis, Paralegal 3960 Government St. Baton Rouge, LA 70806 Telephone: (225) 343-2205 Facsimile: (225) 343-2870 GJM@mlhlaw.com BH@mlhlaw.com Amanda@mlhlaw.com Paralegal@mlhlaw.com

December 6, 2023

Facsimile: (337) 291-6480

Clerk of Court 15<sup>th</sup> Judicial District Court P.O. Box 2009 Lafayette, LA 70502

Re:

James Landry vs. LHC Group Inc.

New Suit

15th Judicial District Court, Parish of Lafayette

Dear Clerk:

Attached please find the Civil Case Cover Sheet and Petition for Damages to be fax-filed in the above-referenced matter this date. The originals will be filed in the record within 7 days. Please send confirmation upon receipt.

Thank you for your assistance and cooperation in this matter.

Sincerely,

Jordan Day Paralegal

Encl.

12

Received: 2253432870

Dec 6 2023 01:37pm No. 1464 P. 3 P003

Lafayette Parish Filed Dec 06, 2023 2:11 PM Martina Reaux

Dec. 6.2023 1:26PM Miller Hampton Hilgendorf Atty te Parish C-20236856

APPENDIX 9.6 LOUISIANA CIVIL CASE REPORTING

Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court
General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

# JAMES LANDRY vs. LHC GROUP INC.

Court: 15TH JUDICIAL DISTRICT COURT	Docket Number:			
Parish of Filing: LAFAYETTE	Filing Date:			
Name of Lead Petitioner's Attorney:	egory J. Miller			
Name of Self-Represented Litigant:				
Number of named petitioners:	Number of named defendants:			
Type of Lawsuit: Please check the catego (no more than 3 categories should be check Auto: Personal Injury	ries which most appropriately apply to this suit cked):  Auto: Property Damage			
Auto: Wrongful Death Asbestos: Property Damage Product Liability Intentional Bodily Injury Intentional Wrongful Death Business Tort Defamation Environmental Tort Intellectual Property Legal Malpractice Other Professional Malpractice Maritime Wrongful Death General Negligence	Auto: Uninsured Motorist  Asbestos: Personal Injury/Death  Premise Liability  Intentional Property Damage  Unfair Business Practice  Fraud  Professional Negligence  Medical Malpractice  Toxic Tort  Other Tort (describe below)  Redhibition  Class action (nature of case)  tigation in one sentence of additional detail:			
Following the completion of this form by counsel, counsel's representative, or by the self-represented litigant, this document will be submitted to the Office of the Judicial Administrator, Supreme Court of Louisiana, by the Clerk of Court.				
Name, address and contact information of perso				
Name Gregory J. Miller S	ignature			
Address 3960 Government Street, Baton Rouge, Louisiana 70806				
Phone number: 225-343-2205 E-1	mail address: gjm@mlhlaw.com			

Received: 2253432870

Dec. 6. 2023 1:26PM

Miller Hampton Hilgendorf Atty

Dec 6 2023 01:37pm No. 1464 P. 4 P004

Lafayette Parish
Filed Dec 06, 2023 2:11 PM
Martina Reaux
Deputy Clerk of Court

JAMES LANDRY

FAX

SUIT NO.

DIV.

**VERSUS** 

15TH JUDICIAL DISTRICT COURT

PARISH OF LAFAYETTE

LHC GROUP INC.

STATE OF LOUISIANA

#### PETITION FOR DAMAGES

NOW INTO COURT, through undersigned counsel, comes and appears, JAMES

LANDRY, a resident of the full age of majority of the Parish of Lafayette, State of Louisiana, who respectfully represents that:

1.

Made Defendant herein is LHC GROUP INC., a domestic company licensed to do, and doing business in the State of Louisiana. Defendant, LHC GROUP INC., was at all times herein relevant acting through its officers, managerial employees, agents, and/or others for whom it is both directly and vicariously liable.

2.

Over the course of his employment, JAMES LANDRY worked for LHC GROUP INC. as an Information Technologist. JAMES LANDRY suffered from irritable bowel syndrome as a result of a stomach surgery necessitating a moderately extended bathroom break. Due to his need to take an extended bathroom break, he suffered a hostile work environment. JAMES LANDRY brought these matters to the attention of LHC GROUP INC. through its human resources department. In a gross violation of his statutory rights, he was terminated from his position.

3.

The aforementioned acts of the Defendant constitute disability discrimination against your Petitioner, JAMES LANDRY, which was a motivating factor in his termination. These matters constituted both physical and mental impairment, and he was substantially limited to one or more major life activities, including, but not limited to, Gastric Bowel functions.

4.

Defendant, LHC GROUP INC., could grant JAMES LANDRY reasonable accommodation of more time for his bathroom break. Despite JAMES LANDRY'S requests, the Defendant failed to provide him an accommodation or to engage in the process regarding such. As a direct result of the failure to grant JAMES LANDRY reasonable accommodation, JAMES LANDRY was fired from the Defendant's employ.

Dec. 6. 2023 1:26PM

Document 2

Filed 01/19/24

Page 6 of 17 PageID #:

Received:2253432870 Miller Hampton Hilgendorf Atty

Dec 6 2023 01:37pm No. 1464 P. P005

5.

In response to JAMES LANDRY'S complaint to LHC GROUP INC. about discrimination and intolerance, LHC GROUP INC. terminated him from its employment.

JAMES LANDRY'S inquiries to Human Resources regarding his statutory rights were a motivating factor in his termination. This was a direct act of illegal retaliation against JAMES LANDRY, in violation of his rights to assert and question his statutory protection from disability discrimination.

6.

As a result of the aforementioned acts of the Defendant, LHC GROUP INC., your Petitioner, JAMES LANDRY, has suffered both pecuniary and non-pecuniary damages, including but not limited to past and future wage loss and benefits, mental and emotional anguish, distress and humiliation, he is entitled punitive damages and attorney's fees, and all other damages afforded to him by law, in such amounts as are reasonable in the premises.

7.

JAMES LANDRY filed charges of employment discrimination with the Equal Employment Opportunity Commission (EEOC) within 300 days of some of the occurrences of which he complained and has filed this Petition for Damages within 90 days of his receipt of a letter advising of his right to sue from the EEOC. Defendant, LHC GROUP INC., employs in excess of 15 employees within this state.

WHEREFORE, Petitioner, JAMES LANDRY, respectfully prays that this Honorable Court, after all due proceedings, render judgment against Defendant, LHC GROUP INC., in favor of Petitioner, JAMES LANDRY, for damages in an amount to be proven at trial, including but not limited to damages reasonable in the premises for loss of wages, future wage and benefit loss, mental anguish, distress and humiliation, as well as punitive damages, and attorney's fees, all with interest from date of demand until paid and for all other legal and equitable relief, and all costs of these proceedings.

Respectfully Submitted:

Gregory V. Miller (# 17059)

MILLEN, HAMPTON & HILGENDORF

3960 Government Street Baton Rouge, LA 70806 Telephone No. (225) 343-2205 Facsimile No. (225) 343-2870

Email: gjm@mlhlaw.com

Case 6:24-cv-00072-DCJ-CBW

Document 2 15

Filed 01/19/24

Page 7 of 17 PageID #:

Received:2253432870 Miller Hampton Hilgendorf Atty

Dec. 6. 2023 1:26PM

Dec 6 2023 01:37pm No. 1464 P. 6 P006

### PLEASE SERVE:

LHC GROUP INC.
Through its registered agent for service: C T Corporation System 3867 Plaza Tower Dr. Baton Rouge, La 70816

Lafayette Parish C-20236856 Filed Dec 06, 2023 2:35 PM Martina Reaux **Deputy Clerk of Court** 

\* \* Transmit Confirmation Report \* \*

Dec 6 2023 02:20pm

Sender:GUEST

TTI Number:

161 SV 51								
Destination '	Туре	Mode	Start Time	Time	Page Note	Result	Details	
912253432870	FAX	Fine	12/06 02:19p	m 00'25'	1	# 0 K		



#### Louis J. Perret

Clerk of Court 15th Judicial District Parish of Lafayette

P.O. Box 2009 Lafayette, LA 70502 Telephone: (337) 291-6400 Fax: (337) 291-6480 www.lpclerk.com

#### FAX RECEIPT

FROM: CIVIL DEPARTMENT

Date: DECEMBER 6, 2023

To: GREGORY J. MILLER

Suit No.: DOCKET NUMBER: C-20236856

FAX NUMBER: (225) 343-2870

Section: J

#### JAMES LANDRY VS LHC GROUP INC

Total Amount Due (Includes all applicable fees below) \$340.50

616-COVER LETTER 45-ATTS/EXH (CASE REPORTING FORM) 628-PET - DAMAGE

2 PAGES 1 PAGE

3 PAGES

The Clerk's office received the above mentioned documents by facsimile transmission dated 12/6/2023 1:37 PM and filed the documents on 12/6/2023, in the above referenced case. In accordance with R.S. 13:850(B), within seven days, exclusive of legal holidays, the party filing the document shall forward to the clerk, the original signed document, applicable filing fees and a transmission fee.

NO FURTHER ACTION WILL BE TAKEN REGARDING THIS DOCUMENT UNTIL ALL FEES AND ORIGINAL(S) ARE RECEIVED IN THIS OFFICE.

WHEN MAILING ORIGINAL DOCUMENT(S), PLEASE ATTACH THIS RECEIPT TO THE DOCUMENT(S) TO BE FILED. IF FILING THE ORIGINAL DOCUMENTS IN PERSON, PLEASE NOTIFY THE FILING CLERK OF THE PREVIOUS FAX FILING.

Deputy Clerk of Court for Louis J. Perret, Clerk of Court

Mattination

\*\*Please note that this amount does not reflect any money that you have on deposit in this matter. It is strictly the amount that is needed to file the above faxed pleadings.

\*\*THE ABOVE DOES NOT APPLY IF YOU ARE PAUPER OR PUBLIC BODY\*\*

CIVIL E-FILING IS AVAILABLE. VISIT WWW.CLERKCONNECT.COM OR WWW.LPCLERK.COM FOR ACCESS TO THE LINK.

Filed 01/19/24 Page 9 of 17 PageID #:

C-20236856

Filed Dec 11, 2023 10:54 AM Kireston Batiste **Deputy Clerk of Court** FAX Received Dec 06, 2023

Lafayette Parish

Miller, Hampton & Hilgendorf

Attorneys at Law

Gregory J. Miller, Attorney Bernard Hampton, Attorney Amanda Hilgendorf, Attorney Jordan Davis, Paralegal

3960 Government St. Baton Rouge, LA 70806 Telephone: (225) 343-2205 Facsimile: (225) 343-2870

GJM@mlhlaw.com BH@mlhlaw.com Amanda@mlhlaw.com Paralegal@mlhlaw.com

December 7, 2023

Clerk of Court 15th Judicial District Court P.O. Box 2009 Lafayette, LA 70502

James Landry vs. LHC Group Inc. Suit No. C-20236856 Sec. "J"

15th Judicial District Court, Parish of Lafayette

Dear Clerk:

STAMPED COPY MAILED December 12, 2023

Enclosed please find the original and (2) copies of the Petition for Damages that was fax-filed on December 6, 2023, in the above-referenced matter. Also, please find enclosed a check in the amount of \$340.50 to cover the associated filing fees.

Please send a stamped copy to our office in the self-addressed stamped envelope that is provided.

Thank you for your cooperation and assistance. Please contact us if you have any questions.

Rachel Tolar Secretary

Encl.

Dec 6 2023 02:20pm







## Louis J. Perret

Clerk of Court 15th Judicial District Parish of Lafayette

P.O. Box 2009 Lafayette, LA 70502 Telephone: (337) 291-6400 Fax: (337) 291-6480 www.lpclerk.com

#### **FAX RECEIPT**

FROM: CIVIL DEPARTMENT

Date: DECEMBER 6, 2023

To: GREGORY J. MILLER

Suit No.: DOCKET NUMBER: C-20236856

FAX NUMBER: (225) 343-2870

Section: 1

JAMES LANDRY VS LHC GROUP INC

Total Amount Due (Includes all applicable fees below) \$340.50

616-COVER LETTER 45-ATTS/EXH (CASE REPORTING FORM) 628-PET - DAMAGE

2 PAGES

1 PAGE

3 PAGES

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NO FURTHER ACTION WILL BE TAKEN REGARDING THIS DOCUMENT UNTIL ALL FEES AND ORIGINAL(S) ARE RECEIVED IN THIS OFFICE.

WHEN MAILING ORIGINAL DOCUMENT(S), PLEASE ATTACH THIS RECEIPT TO THE DOCUMENT(S) TO BE FILED. IF FILING THE ORIGINAL DOCUMENTS IN PERSON, PLEASE NOTIFY THE FILING CLERK OF THE PREVIOUS FAX FILING.

Deputy Clerk of Court for Louis J. Perret, Clerk of Court

Suit Accounting Dept. Form #6 Rev. 08/26/14

\*\*Please note that this amount does not reflect any money that you have on deposit in this matter. It is strictly the amount that is needed to file the above faxed pleadings.

\*\*THE ABOVE DOES NOT APPLY IF YOU ARE PAUPER OR PUBLIC BODY\*\*

CIVIL E-FILING IS AVAILABLE. VISIT WWW.CLERKCONNECT.COM OR WWW.LPCLERK.COM FOR ACCESS TO THE LINK.

Lafayette Parish C-20236856 Filed Dec 11, 2023 10:54 AM Kireston Batiste Deputy Clerk of Court FAX Received Dec 06, 2023

#### **APPENDIX 9.6**

#### LOUISIANA CIVIL CASE REPORTING

Civil Case Cover Sheet - LA. R.S. 13:4688, Part G, §13 of the Louisiana Supreme Court General Administrative Rules, and Appendix 9.6 of the Louisiana District Court Rules

This civil case cover sheet shall be completed by counsel for the petitioner, counsel's authorized representative, or by the self-represented litigant (if not represented by counsel) and submitted with the original petition filed with the court. The information should be the best available at the time of filing. This information does not constitute a discovery request, response or supplementation, and is not admissible at trial.

Suit Caption:

## JAMES LANDRY

VS.

LHC GROUP INC.						
Court: 15 <sup>TH</sup> JUDICIAL DISTRICT COURT	Docket Number:					
Parish of Filing: LAFAYETTE	Filing Date:					
Name of Lead Petitioner's Attorney:Gr	Name of Lead Petitioner's Attorney: Gregory J. Miller					
Name of Self-Represented Litigant:						
Number of named petitioners:1	Number of named defendants:					
Type of Lawsuit: Please check the categor (no more than 3 categories should be check that a categories should be checked that a categories sho	cries which most appropriately apply to this suit cked):  Auto: Property Damage Auto: Uninsured Motorist Asbestos: Personal Injury/Death Premise Liability Intentional Property Damage Unfair Business Practice Fraud Professional Negligence Medical Malpractice Toxic Tort Other Tort (describe below) Redhibition Class action (nature of case)					
Please briefly describe the nature of the litigation in one sentence of additional detail:						
Following the completion of this form by couns litigant, this document will be submitted to the Coursiana, by the Clerk of Court.	el, counsel's representative, or by the self-represented Office of the Judicial Administrator, Supreme Court of					
Name, address and contact information of person completing form:						
Name Gregory J. Miller S	ignature 3					
Address 3960 Government Street, Baton Rouge, Louisiana 70806						
Phone number: 225-343-2205 E-1	mail address: gjm@mlhlaw.com					

Lafayette Parish C-20236856 Filed Dec 11, 2023 10:54 AM **Kireston Batiste Deputy Clerk of Court** FAX Received Dec 06, 2023

JAMES LANDRY

SUIT NO. C-20236856

DIV. J

**VERSUS** 

15TH JUDICIAL DISTRICT COURT

PARISH OF LAFAYETTE

LHC GROUP INC.

STATE OF LOUISIANA

#### **PETITION FOR DAMAGES**

NOW INTO COURT, through undersigned counsel, comes and appears, JAMES LANDRY, a resident of the full age of majority of the Parish of Lafayette, State of Louisiana, who respectfully represents that:

1.

Made Defendant herein is LHC GROUP INC., a domestic company licensed to do, and doing business in the State of Louisiana. Defendant, LHC GROUP INC., was at all times herein relevant acting through its officers, managerial employees, agents, and/or others for whom it is both directly and vicariously liable.

Over the course of his employment, JAMES LANDRY worked for LHC GROUP INC. as an Information Technologist. JAMES LANDRY suffered from irritable bowel syndrome as a result of a stomach surgery necessitating a moderately extended bathroom break. Due to his need to take an extended bathroom break, he suffered a hostile work environment. JAMES LANDRY brought these matters to the attention of LHC GROUP INC. through its human resources department. In a gross violation of his statutory rights, he was terminated from his position.

The aforementioned acts of the Defendant constitute disability discrimination against your Petitioner, JAMES LANDRY, which was a motivating factor in his termination. These matters constituted both physical and mental impairment, and he was substantially limited to one or more major life activities, including, but not limited to, Gastric Bowel functions.

Defendant, LHC GROUP INC., could grant JAMES LANDRY reasonable accommodation of more time for his bathroom break. Despite JAMES LANDRY'S requests, the Defendant failed to provide him an accommodation or to engage in the process regarding such. As a direct result of the failure to grant JAMES LANDRY reasonable accommodation, JAMES LANDRY was fired from the Defendant's employ.

5.

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JAMES LANDRY'S inquiries to Human Resources regarding his statutory rights were a motivating factor in his termination. This was a direct act of illegal retaliation against JAMES LANDRY, in violation of his rights to assert and question his statutory protection from disability discrimination.

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As a result of the aforementioned acts of the Defendant, LHC GROUP INC., your Petitioner, JAMES LANDRY, has suffered both pecuniary and non-pecuniary damages, including but not limited to past and future wage loss and benefits, mental and emotional anguish, distress and humiliation, he is entitled punitive damages and attorney's fees, and all other damages afforded to him by law, in such amounts as are reasonable in the premises.

7.

JAMES LANDRY filed charges of employment discrimination with the Equal Employment Opportunity Commission (EEOC) within 300 days of some of the occurrences of which he complained and has filed this Petition for Damages within 90 days of his receipt of a letter advising of his right to sue from the EEOC. Defendant, LHC GROUP INC., employs in excess of 15 employees within this state.

WHEREFORE, Petitioner, JAMES LANDRY, respectfully prays that this Honorable Court, after all due proceedings, render judgment against Defendant, LHC GROUP INC., in favor of Petitioner, JAMES LANDRY, for damages in an amount to be proven at trial, including but not limited to damages reasonable in the premises for loss of wages, future wage and benefit loss, mental anguish, distress and humiliation, as well as punitive damages, and attorney's fees, all with interest from date of demand until paid and for all other legal and equitable relief, and all costs of these proceedings.

Respectfully Submitted:

Gregory J. Miller (# 17059)

MILLER, HAMPTON & HILGENDORF

3960 Government Street Baton Rouge, LA 70806

Telephone No. (225) 343-2205

Facsimile No. (225) 343-2870

Email: gjm@mlhlaw.com

## PLEASE SERVE:

LHC GROUP INC.
Through its registered agent for service:
C.T. Corporation System

C T Corporation System 3867 Plaza Tower Dr. Baton Rouge, La 70816



Requested by Atty.: MILLER, GREGORY J.

## **CITATION**

**JAMES LANDRY** 

15TH JUDICIAL DISTRICT COURT

DOCKET NUMBER: C-20236856 J

LHC GROUP INC

PARISH OF LAFAYETTE, LOUISIANA

#### STATE OF LOUISIANA

TO: LHC GROUP INC.

THROUGH ITS REGISTERED AGENT FOR SERVICE: C T CORPORATION SYSTEM

3867 PLAZA TOWER DR. BATON ROUGE, LA 70816



of the Parish of E. BATON ROUGE

You are hereby cited to comply with the demand contained in the petition, a certified copy of which accompanies this citation, (exclusive of exhibits). You should file an answer or other pleading to said petition in the office of the Clerk of the 15th Judicial District Court in the Lafayette Parish Courthouse, Lafayette, Louisiana, within twenty-one (21) days after the service hereof, except as provided for by law. Alternatively, your failure to comply herewith will subject you to the penalty of entry of default judgment against you.

WITNESS THE HONORABLE JUDGES OF SAID COURT, this DECEMBER 11, 2023.

monet Mc Carthy

Deputy Clerk of Court Lafayette Parish

#### THE CLERK OF COURT'S STAFF CANNOT PROVIDE LEGAL ADVICE.

\*Attached are the following documents: FAXED AND ORIGINAL: PETITION FOR DAMAGES

	SHERIFF'S RETURN LAFAYETTE PARISH SH	ERIFF atayet	te Parish Clerk of Court Filed This Day
DATE SERVED:		TIME:	JAN & Rosul
PERSONAL()			no Out of Court
DOMICILIARY ( ) ON			Martina Ores of Court
UNABLE TO LOCATE	MOVED()	NO SUCH ADDRESS (	
OTHER REASON:			made service on the named party through the
RECEIVED TOO LATE FOI	R SERVICE ( )		CT LOIDOID.
SERVICE OF WITHIN PAP	ERS		8 to 2 0 7023 5
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DEPUTY			by tendering a bopy of the
<b>y</b>			DY. B. GARAFOLA #0577 Deputy Sheriff, Parish of East Baton Rouge, Louisians

## 15TH JUDICIAL DISTRICT COURT FOR THE PARISH OF LAFAYETTE STATE OF LOUISIANA

NO. C-2023-6856 DIVISION "J"

JAMES LANDRY

v.

LHC GROUP INC.

FILED:		
	DEPUTY CLERK	

## **NOTIFICATION OF REMOVAL**

TO: Honorable Louis J. Perret Clerk of Court 20th Judicial District Court for the Parish of Lafayette P. O. Box 2009 Lafayette, Louisiana 70502

James Landry
Through his attorney of record:
Gregory J. Miller
MILLER, HAMPTON & HILGENDORF
3960 Government Street
Baton Rouge, Louisiana 70806

PLEASE TAKE NOTICE that defendant, LHC Group Inc., has removed this case to the United States District Court for the Western District of Louisiana. Attached hereto is a true and correct copy of the Notice of Removal.

Respectfully submitted this 19<sup>th</sup> day of January, 2024.

/s/ Adrienne M. Wood

Andrew J. Baer (La. Bar #35638)

Andrew.Baer@jacksonlewis.com

Adrienne M. Wood (La. Bar # 38448)

Adrienne.Wood@jacksonlewis.com

**JACKSON LEWIS P.C.** 

601 Poydras Street, Suite 1400 New Orleans, Louisiana 70130

Telephone: (504) 208-1755 Facsimile: (504) 208-1759

COUNSEL FOR DEFENDANT, LHC GROUP, INC.



## **CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of January, 2024, I forwarded a copy of the foregoing

to:

Gregory J. Miller
MILLER, HAMPTON & HILGENDORF
3960 Government Street
Baton Rouge, Louisiana 70806
gjm@mlhlaw.com

via electronic mail and U. S. Mail, postage prepaid.

/s/ Adrienne M. Wood
Adrienne M. Wood

4864-9609-2830, v. 1